

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:	)	CHAPTER 13
	)	
<b>JAIME CLARESE THOMAS,</b>	)	<b>CASE NO.: 24-62216-BEM</b>
	)	
Debtor.	)	

**NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that Debtor has filed a “Motion to Extend the Automatic Stay,” and related papers with the Court seeking an order continuing the Automatic Stay of 11 U.S.C. Section 362(a) beyond the thirty-day limit set forth in 11 U.S.C. Section 362(c)(3)(A) as to all applicable entities until the Court grants relief from the stay for cause, or the stay is terminated pursuant to 11 U.S.C. Section 362(c)(1) or (2).

**PLEASE TAKE FURTHER NOTICE** that the Court will hold a hearing on the Motion at **10:30 A.M. on December 04, 2024, in Courtroom 1402, U.S. Courthouse, 75 Ted Turner Drive (f/k/a Spring Street), SW, Atlanta, GA 30303**, which may be attended in person or via the Court’s Virtual Hearing Room. You may join the Virtual Hearing Room through the “Dial-in and Virtual Bankruptcy Hearing Information” link at the top of the homepage of the Court’s website, [www.ganb.uscourts.gov](http://www.ganb.uscourts.gov), or the link on the judge’s webpage, which can also be found on the Court’s website. Please also review the “Hearing Information” tab on the judge’s webpage for further information about the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the judge’s webpage.

Your rights may be affected by the Court’s ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the Court to grant the relief sought in these pleadings or if you want the Court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleadings with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk before the hearing. The address of the Clerk's Office is Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, Atlanta Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

Dated: November 21, 2024

/s/  
Paige N. Pierson  
GA Bar No. 834602  
The Semrad Law Firm, LLC  
6125 Old National Hwy,  
Suite 121  
Atlanta, Georgia 30349  
678-673-2174  
[pperson@semradlaw.com](mailto:pperson@semradlaw.com)  
Attorney for the Debtor

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE: ) CHAPTER 13  
)  
JAIME CLARESE THOMAS, ) CASE NO.: **24-62216-BEM**  
)  
Debtor. )

**MOTION TO EXTEND AUTOMATIC STAY**

COMES NOW Debtor, Jaime Clarese Thomas and asks this Court to extend the automatic stay of 11 U.S.C. Section 362(a) in this Chapter 13 Bankruptcy Case beyond the period of thirty days against all creditors and shows the Court the following:

1.

On November 15, 2024, Debtor filed a Voluntary Petition for bankruptcy relief under Title 11, Chapter 13 of the United States Code.

2.

Debtor has filed one previous bankruptcy case, bringing it within 11 U.S.C. Section 362(c)(3), Chapter 13 Case Number 24-57975-bem was filed on August 02, 2024, in the Northern District of Georgia, Atlanta Division and dismissed on October 24, 2024, for failure to pay filing fee.

3.

Debtor filed the instant case in good faith in an effort to obtain the protections of the automatic stay.

4.

There has been a change in circumstances since the previous case was dismissed. Debtor's previous case has been dismissed due to failure to pay the filing fee. In the current case, the filing fee has been paid concurrently with the case filing.

5.

Extension of the automatic stay will not harm the creditors. In the instant case, Debtor has proposed to pay \$1,257.00 per month through the Chapter 13 Plan.

6.

Debtor has filed the instant case in good faith. Debtor asks the Court to find that the presumption that the instant case was not filed in good faith has been rebutted by clear and convincing evidence, as outlined above, and extend the automatic stay. Debtor asks the Court to allow him the opportunity to be successful in his current Chapter 13 case in an effort to catch up on arrearages.

WHEREFORE, Debtor prays that this motion be granted and that the automatic stay of 11 U.S.C. Section 362(a) be extended beyond thirty days against all creditors.

Dated: November 21, 2024

/s/  
Paige N. Pierson  
GA Bar No. 834602  
The Semrad Law Firm, LLC  
6125 Old National Hwy,  
Suite 121  
Atlanta, Georgia 30349  
678-673-2174  
[pperson@semradlaw.com](mailto:pperson@semradlaw.com)  
Attorney for the Debtor

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
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IN RE: ) CHAPTER 13  
)  
**JAIME CLARESE THOMAS,** ) CASE NO.: **24-62216-BEM**  
)  
Debtor. )

**CERTIFICATE OF SERVICE**

I hereby certify that I am more than 18 years of age and that I have this day served a copy of the within Motion to Extend Automatic Stay upon the following by depositing a copy of the same in U.S. Mail with sufficient postage affixed thereon to ensure delivery:

Jaime Clarese Thomas  
2521 Cornerstone Blvd  
Hampton, GA 30228

Wells Fargo Bank N.a., D/  
B/A Wells Fargo Auto  
800 Walnut Street,  
Des Moines, IA, 50309

Wells Fargo Bank N.a., D/  
B/A Wells Fargo Auto  
P.O. Box 169005  
Irving, TX 75016

Wells Fargo Bank, National Association  
c/o Charles W. Scharf, CEO  
101 N. Phillips Avenue  
Sioux Falls, SD 57104

Wells Fargo Auto  
P.O. Box 17900  
Denver, CO 80217-0900

Wells Fargo Bank, National Association  
FDIC Cert #3511  
101 N. Phillips Avenue  
Sioux Falls, SD 57104

*See attached for additional creditors served*

I further certify that, by agreement of parties, K. Edward Safir, Standing Chapter 13 Trustee, was served via the ECF electronic mail/noticing system.

Dated: November 21, 2024

/s/\_\_\_\_\_  
Paige N. Pierson  
GA Bar No. 834602  
The Semrad Law Firm, LLC  
6125 Old National Hwy, Suite 121  
Atlanta, Georgia 30349  
678-673-2174  
Attorney for the Debtor

Label Matrix for local noticing  
113E-1  
Case 24-62216-bem  
Northern District of Georgia  
Atlanta  
Wed Nov 20 06:48:52 EST 2024

1st Franklin Financial Corporation  
Po Box 880  
ATTN: Administrative Services  
Toccoa, GA 30577-0880

Acceptance Now  
5501 Headquarters Dr  
ATTN: Acceptance Now Customer Service  
Plano, TX 75024-5837

Affirm Inc  
650 California St  
Fl 12  
San Francisco, CA 94108-2716

Aflac  
1932 Wynnton Road  
Columbus, GA 31999-0002

American First Finance, LLC  
P.O. Box 565848  
Dallas, TX 75356-5848

Austin Capital Bank Ss  
512 E RIVERSIDE DR STE 100  
AUSTIN, TX 78704-1356

Bank Of America  
PO Box 982284  
El Paso, TX 79998-2284

CHIME/STRIDE BANK NA  
324 W BROADWAY AVE  
ENID, OK 73701-3838

CLEO/WEBBANK  
215 S STATE ST STE 1000  
SALT LAKE CITY, UT 84111-2336

Capital One  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

Comenity Bank/Lnbryant  
4590 E Broad St  
Columbus, OH 43213-1301

Comenitybank/Victoria  
PO BOX 182128  
COLUMBUS, OH 43218-2128

(p)U S DEPARTMENT OF JUSTICE TAX DIVISION  
CIVL TRIAL SECTION SOUTHERN REGION  
P O BOX 14198  
WASHINGTON DC 20044-4198

EDC/ESUSU/PROGRESS RES  
7500 N DOBSON RD STE 300  
SCOTTSDALE, AZ 85256-2727

Edfinancial Services L  
120 N Seven Oaks Dr  
Knoxville, TN 37922-2359

(p)GEORGIA DEPARTMENT OF REVENUE  
COMPLIANCE DIVISION  
ARCS BANKRUPTCY  
1800 CENTURY BLVD NE SUITE 9100  
ATLANTA GA 30345-3202

Georgia Student Financ  
2082 E Exchange Pl  
Tucker, GA 30084-5334

Gm Financial  
4001 EMBARCADARO  
ARLINGTON, TX 76014-4106

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

Internal Revenue Service - Atl  
401 West Peachtree St NW Room 1665  
ATTN: Ella Johnson, M/S 334-D  
Atlanta, GA 30308

(p)JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

LVNV Funding, LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Curt Olof Lindstrom II  
The Semrad Law Firm, LLC  
6125 Old National Hwy, Ste 121  
College Park, GA 30349-4407

Lvnv Funding, Llc  
PO Box 10587  
Greenville, SC 29603-0587

(p)OFFICE OF THE ATTORNEY GENERAL OF GEORGIA  
BUSINESS AND FINANCE BANKRUPTCY  
40 CAPITOL SQUARE SW  
ATLANTA GA 30334-9057

Office Of The United States Trustee  
75 Ted Turner Dr Sw  
Atlanta, GA 30303-3315

(p)PERPAY INC  
ATTN CONOR HORAN  
2400 MARKET STREET SUITE 300  
PHILADELPHIA PA 19103-3033

Paige Nicole Pierson  
The Semrad Law Firm, LLC  
6125 Old National Hwy, Ste 121  
College Park, GA 30349-4407

Progress Residential  
7500 N. Dobson Rd  
Scottsdale, AZ 85256-2727

RAM Receivables LLC  
Agent of Huntington Debt Holdings  
PO Box 25693  
Memphis, TN 38125-8009

(p)SELF INC  
901 E 6TH STREET SUITE 400  
AUSTIN TX 78702-3206

K. Edward Safir  
Standing Chapter 13 Trustee  
Suite 1600  
285 Peachtree Center Ave. NE  
Atlanta, GA 30303-1229

Special Assistant U.S. Attorney  
401 W. Peachtree Street, NW  
STOP 1000-D, Suite 600  
Atlanta, GA 30308

Jaime Clarese Thomas  
2521 Cornerstone Blvd  
Hampton, GA 30228-3794

(p)US BANK  
PO BOX 5229  
CINCINNATI OH 45201-5229

United States Attorney  
Northern District of Georgia  
75 Ted Turner Drive SW, Suite 600  
Atlanta GA 30303-3309

WFBN AUTO  
PO BOX 29704  
PHOENIX, AZ 85038-9704

Wells Fargo Bank N.a.  
D/B/A Wells Fargo Auto  
P.O. Box 130000  
Raleigh, NC 27605-1000

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Department Of Justice, Tax Division  
75 Ted Turner Drive Sw  
Civil Trial Section, Southern  
Atlanta, GA 30303

Georgia Department Of Revenue  
1800 Century Blvd NE Ste 9100  
c/o J. Houston  
Atlanta, GA 30345

Jefferson Capital Systems Llc  
P.O. Box 7999  
Saint Cloud, MN 56302

Office Of The Attorney General - Atl  
40 Capitol Square, SW  
Atlanta, GA 30334

Perpay  
2400 MARKET ST STE 300  
PHILADELPHIA, PA 19103

SELF FINANCIAL/LEAD BA  
901 E. 6TH STREET SUITE #400  
Austin, TX 78702

(d)Sbnaselflndr  
901 E 6TH ST STE 400  
AUSTIN, TX 78702

U.s. Bank Na  
DBA Elan Financial Services  
Bankruptcy Department  
P.O. Box 108  
Saint Louis, MO 63166

End of Label Matrix  
Mailable recipients 38  
Bypassed recipients 0  
Total 38